

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 12-md-2323 (AB)
MDL No. 2323

THIS DOCUMENT RELATES TO:

Plaintiffs' Master Administrative Long-Form Complaint and:

RANDY DAVIS PHILLIPS, JR., Only
v. National Football League, *et. al.*
No. 2:14-cv-02623-AB (E.D. PA)

**MOTION FOR LEAVE OF COURT TO WITHDRAW AS COUNSEL
FOR PLAINTIFF, RANDY DAVIS PHILLIPS, JR.**

COMES NOW, Philip A. Gold and Ian M. Kirtman of Gold & Gold, P.A., move this Honorable Court for permission to withdraw as counsel for Plaintiff, RANDY DAVIS PHILLIPS, JR., and as grounds therefore state:

1. Plaintiff's counsel filed a short form complaint for Plaintiff, RANDY DAVIS PHILLIPS, JR., on May 1, 2014 [D.E. # 5987].
2. Since then, irreconcilable differences have arisen between Plaintiff and undersigned counsel.
3. Plaintiff's counsel properly notified RANDY DAVIS PHILLIPS, JR. of counsels' intention to withdraw from representing him in this matter.
4. Plaintiff's counsel is not aware of Plaintiff engaging substitute counsel, nor has

undersigned counsel been contacted by any counsel on behalf of Plaintiff.

5. Nevertheless, under the circumstances, it is apparent that the undersigned must move the Court for leave to withdraw as counsel.

WHEREFORE, Plaintiff's counsel respectfully request this Court for leave to withdraw as counsel for RANDY DAVIS PHILLIPS, JR., only, in Case No.: 12-md-2323, and Case No.: 2:14-cv-02623-AB.

RESPECTFULLY SUBMITTED:

GOLD & GOLD, P.A.

Attorneys for Plaintiff

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By: /s/ Ian Kirtman

Philip A. Gold, Esquire

Florida Bar No.: 0032550

Ian M. Kirtman, Esquire

Florida Bar No.: 0084393

CERTIFICATE OF SERVICE

It is hereby certified that a true copy of the foregoing was served electronically via the Court's electronic filing system on September 15, 2014, upon all counsel of record.

Dated: September 15, 2014

/s/Ian M. Kirtman
Ian M. Kirtman